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October 6, 2000

The Honorable Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, Southwest
Washington, D.C. 20554

Re: Ultra-wideband ET Docket 98-153

Dear Madam Secretary:

As governor of the state of Alabama, I am writing to register my strong support for the Federal Communications Commission's action on proposed rulemaking concerning ultra-wideband radio.

As you are aware, one of the major producers of ultra-wideband devices, Time Domain, is located in Alabama. This company's time-modulated ultra-wideband technology (TM-UWB) will enable significant improvements in communications, radar and position-location tracking. UWB technology has great potential to carry vast amounts of data and may provide the ultimate solution for delivering services in rural areas. UWB also holds enormous promise for aviation safety applications. The potential benefits of UWB technology will greatly improve the quality of life not only for the people of Alabama, but also for millions of Americans.

I encourage the FCC to move promptly in making decisions regarding the technical issues of UWB technology. Such action will allow for the timely deployment of UWB, enabling our nation to realize the maximum advantages from this technology.

With gratitude for your consideration of this matter and kindest regards, I am ...

Sincerely,

Don Siegelman
Governor

DS/sb/me

AAPD
AMERICAN ASSOCIATION OF
PEOPLE WITH DISABILITIES

October 12, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Ultra-Wideband, ET Docket 98-153

Dear Ms. Salas:

On behalf of the American Association of People with Disabilities (AAPD), I write to request that the Commission move forward promptly to approve the use of ultra-wideband (UWB) devices, particularly those which use spectrum above 2 GHz. A number of companies are in the process of developing networking and monitoring products using UWB which have the potential to dramatically improve the lives of people with disabilities, particularly those who have limited mobility.

AAPD is a national non-profit, non-partisan cross-disability membership organization advocating for the political and economic empowerment of the more than 56 million people with disabilities in the U.S. We see equal access to technology as a critical issue for our members and we appreciate the leadership role that the Commission has played in recent years to promote access issues within your jurisdiction. UWB is a good example of a developing technology that can improve the quality of life of people with a range of disabilities and enhance their ability to live independently.

Two areas of UWB technology are particularly worth highlighting in terms of their potential benefit for people with disabilities. First, monitoring technologies provide the ability to summon aid from virtually anywhere in a house. Although today's "panic button" technologies provide the potential for summoning help, they can be expensive to install and/or continue service. UWB, by contrast, has the potential to extend this functionality throughout the house at a relatively low price by using wireless technology and a device that people could carry with them. This combination of low cost and wide range of movement will be particularly attractive for people with disabilities who are disproportionately on limited incomes.

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Second, networking technologies under development by several UWB companies have the potential to make "smart homes" a reality. And while "smart homes" have been touted for their impact on people without disabilities, we in the disability community are particularly excited about the potential that these homes hold for people with disabilities who wish to live independently. Using UWB, smart homes can make independent living a reality for hundreds of thousands of disabled persons currently dependent on others for their care. A smart home that is wirelessly networked has the potential to allow a disabled person to conduct many tasks from turning on appliances to surfing the internet that may be more difficult for them to conduct today. We see UWB as helping to make this technology affordable, available, and accessible to all Americans.

As UWB technology is being developed, AAPD strongly encourages the Commission to take an active role in ensuring that products and services using UWB technologies are accessible and affordable for people with a variety of disabilities. From the telephone to the personal computer to the internet, too many technologies in the past have fallen short of providing equal access for people with disabilities as they have emerged. While Congress and the FCC have over time stepped in to improve access, past experience has shown us that disability access does not need to add significant costs to products and services as long as universal design principles are employed in the initial design stages of these products and services. We urge the Commission to impress upon UWB developers the need to integrate disability access into monitoring and networking technologies that are currently under development because of the incredible potential these applications have for enhancing the lives of Americans with disabilities.

I understand that there has been some discussion in the proceeding about the potential for harmful interference caused by some UWB products, but my understanding is that these concerns have so far been limited to products which operate below 2 GHz. However, many UWB products, including most of the networking and monitoring applications discussed above, only operate above 2 GHz. We urge the Commission to move forward in its approval of devices above 2 GHz promptly, and to impress upon developers the need to build disability access features into their products and services. The promise of UWB for people with disabilities and others who stand to benefit from the developing technology should not be overlooked in these proceedings.

Thank you for your attention to this matter.

Sincerely yours,

Andrew J. Imparato
President and CEO
American Association of People with Disabilities